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SCOTT DEGROAT, DAVID J. HAYES, DANIEL
LEE, MISHel McCUMBER, JEFF PEDERSEN,
JORDAN SATHER, SARAH WESTALL

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

JOHN DOE, an individual; MICHAEL
DOE, an individual; JAMES DOE, an
individual; HENRY DOE, an individual;
ROBERT DOE, an individual;
CHRISTOPHER DOE, an individual;
MATHEW DOE, an individual; POLLY
ST. GEORGE, an individual; SCOTT
DEGROAT, an individual; DAVID J.
HAYES, an individual; DANIEL LEE,
an individual, MISHel McCUMBER, an
individual; JEFF PEDERSEN, an
individual; JORDAN SATHER, an
individual; SARAH WESTALL, an
individual,

Plaintiffs,

vs.

GOOGLE, LLC., a Delaware limited
liability company; YOUTUBE LLC, a
Delaware limited liability company;
DOES 1 through 10, inclusive.

Defendants.

Case No. 5:20-cv-07502

**DECLARATIONS OF M. CRIS
ARMENTA, LAUREN GALLO
WHITE, LINDSEY CRAWLEY;
JOHN DOE, MICHAEL DOE, JAMES
DOE, HENRY DOE, ROBERT DOE,
CHRISTOPHER
DOE, MATTHEW DOE, POLLY ST.
GEORGE, SCOTT DEGROAT,
DAVID J. HAYES, DANIEL
LEE, MISHel McCUMBER, JEFF
PEDERSEN, JORDAN SATHER,
SARAH WESTALL IN SUPPORT OF
APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND
ORDER TO SHOW CAUSE RE
PRELIMINARY INJUNCTION**

Date Filed: October 26, 2020

DECLARATION OF M. CRIS ARMENTA

I, M. Cris Armenta, declare:

1. I am an attorney admitted to practice before this Court and a member in good standing with the State Bar of California. I am a shareholder in Armenta & Sol, PC, counsel of record to the Plaintiffs in this action. I make this declaration based on my own personal knowledge and if called as a witness, I could and would testify competently as follows:

2. On October 25, 2020, within two hours after filing the Complaint in this action, I notified counsel for the Defendants that the Complaint had been filed, attached a conformed copy of the Complaint, and advised them that the Plaintiffs would immediately be seeking a Temporary Restraining Order and Order to Show Cause re Preliminary Injunction. Attached as **Exhibit A** is a true and correct copy of that email. I also sent them on October 25, 2020, a copy of the Civil Cover Sheet. On October 27, 2020, I provided them the Consent/Declination re Magistrate Judge.

3. Immediately after uploading the Application and all supporting papers through the ECF filing system, I will provide the Defendants with a full copy of the papers.

4. On October 15, 2020, YouTube published on a blog a statement about updating its Harassment and cyberbullying policy. That blog post is attached hereto as **Exhibit B**.

5. The YouTube Terms of Service are often captured in the Internet Archive, located at www.archive.org. Attached as **Exhibit C** is a true and correct copy of a snapshot of YouTube's Cyberbullying and Harassment Policy, as it was captured on October 15, 2020. Attached as **Exhibit D** is a true and correct copy of a snapshot of YouTube's Cyberbullying and Harassment Policy, as it was captured on October 17, 2020. I have placed a red box around the new content that appeared on the snapshot on October 17, 2020 but was not captured on the snapshot dated October 15, 2020.

6. Attached as **Exhibit E** is a true and correct copy of a report by Brandwatch, concluding that YouTube is very important to "understanding things happening around the world." <https://www.brandwatch.com/blog/youtube-stats/>.

7. Attached as **Exhibit F** is a true and correct copy of an article published by the Pew Research Center, a nonpartisan think tank based in Washington, D.C. that provides information about social issues, public opinion and demographic trends shaping the United States and the world, concluding that legacy and independent media are thriving side by side, and established news organizations no longer have full control over the news Americans watch. Most YouTube news consumers view both legacy and independent news videos on the platform. An extensive survey conducted by the Pew Research Center confirms that independent news channels occupy a prominent position in YouTube's media ecosystem. The 377 most popular YouTube channels represent a mixture of established news organizations (49%) and independent channels (42%). See Stocking, Gale et al., "Many Americans Get News on YouTube, Where News Organizations and Independent Producers Thrive Side by Side," Pew Research Center, Sept. 28, 2020, <https://www.journalism.org/2020/09/28/many-americans-get-news-on-youtube-where-news-organizations-and-independent-producers-thrive-side-by-side/within>

8. Attached as **Exhibit G** is a true and correct copy of the YouTube "strike policy" which is published on [www.youtube.com](https://support.google.com/youtube/answer/2802032?hl=en) in its Help Center at <https://support.google.com/youtube/answer/2802032?hl=en>.

9. Attached as **Exhibit H** is a true and correct copy of a letter United States Representative Adam Schiff published on his Congressional website and on Congressional letterhead, on or about February 14, 2019.

10. Attached as **Exhibit I** is a true and correct copy of a letter United States Representative Adam Schiff published on his Congressional website and on Congressional letterhead, on or about April 29, 2020.

11. Attached as **Exhibit J** is a true and correct copy of a Tweet response to Adam Schiff, published on the account of YouTube Chief Executive Officer Executive Officer Susan Wojcicki after Representative Schiff tweeted Exhibit I to her.

DECLARATIONS IN SUPPORT OF APPLICATION FOR TRO

DECLARATION OF LINDSEY CRAWLEY

I, Lindsey Crawley, declare:

1. I am over eighteen and not a party to this action. I have been retained as a consultant and expert in connection with Doe, et al. v. Google, United States District Court, Northern District of California, Case No. 20-cv-7502.

2. I am from Atlanta Georgia. I earned a Bachelor's in Business Administration from Emory University with a degree in Finance. From 1984 until 1985, I worked on the sales team for E & T Business Computer Products in New York City. From 1985 through 1987, I worked as a Systems Analyst for Republic National Bank in New York City. From 1987 through 1991, I worked as a Net Analyst for Digital Equipment Corporation in Atlanta, Georgia. From 1992 through 1999, I founded, built and sold Lyceum Internet Services in Atlanta, and sold it to a publicly traded company, SINet, in an all cash transaction in December of 1999. In 2001, I founded 'Notebook Depot SA', Vina del Mar, Chile and worked there for 2 years. I founded and ran 'DialGlobal.net' Voice over Internet Protocol (VOIP) Provider in Mendoza Argentina & Vina Del Mar Chile from 2006 through 2008. From 2009 through 2010, I founded 'SmartCellulares', Florianopolis Brasil and then retired.

3. My expertise in in the areas of communications, the internet, aggregation of data and systems to aggregate that data, such from the YouTube platform.

4. In 2019, I came out of retirement to form a company and its attendant website that creates an unbiased community catalog of limited state, removed, and self-censored YouTube videos across 7158 monitored channels. We maintain records and snapshots of the deletions by YouTube of channels and content, and aggregate data that is otherwise unavailable to the public after a channel is deleted. The goal of the site is to be the reference for YouTube censored content through a community effort across ideological lines, while raising awareness of online censorship and promoting free speech.

5. I have gathered the data as it relates to the 18 channels owned and created by the Plaintiffs. Attached as **Exhibit P** is a true and correct copy of a spreadsheet showing the analytics for each of the Plaintiffs' channels. This spreadsheet in my opinion, contains the most

/s/ Lindsey Crawley

Case No. 20-cv-07502

DECLARATIONS IN SUPPORT OF APPLICATION FOR TRO

DECLARATION OF JOHN DOE

I, **JOHN DOE**, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I am proceeding under a pseudonym in this case because I have maintained my anonymity with respect to the work that I do and the speech that I offer to the public. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. I am a Christian Evangelist. The content I create focuses on the message of God, and in analyzing and debunking the news offered by the mainstream media with the tagline “God’s Grace is Greater.” The channel aims to inform and enlighten the audience by publicly airing my opinions for the community at large to create a forum for a positive discussion. JustInformed Talk addresses the narratives offered by the mass media, through sarcasm and humor. The channel is advertised as political satire and opinionated editorial review.

3. I created a channel on YouTube on January 15, 2015 called “Just Informed Talk.” I uploaded or caused to be uploaded approximately 890 videos on this channel. As of October 15, 2020, the channel had obtained approximately 281,000 subscribers, and the videos had been viewed by the public approximately 60,154,395 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not given sufficient time, or any time, to export the content and information on the channel that I had built up since the date of the channel’s creation.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channel, I lost contact and the ability to connect with the subscribers, my regular audience,

1 through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise
2 contact the subscribers and audience I had built up over time. Because other media companies
3 are also in the process of taking action against my channel, I have lost a substantial, if not all,
4 of my YouTube audience.

5 6. Although other platforms indicate that they may remove channels or content at
6 any time, YouTube employs specific Terms of Service that assured me that in the absence of
7 strikes, my content and channel would remain intact. During the 90-day period preceding
8 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
9 any such strikes.

10 7. I was not notified by YouTube that they intended or had attempted to amend the
11 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
12 channel.

13 8. I was not notified by YouTube of the specific reason for the suspension or
14 deletion of my channel other than an email referencing generally their cyberbullying and
15 harassment policy, but my content was not cyberbullying or harassing in the ways described in
16 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
17 was viewed by YouTube as being materially in breach of the TOS, only an email located after
18 the fact of deletion that said ““We'd like to inform you that due to repeated or severe violations
19 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
20 to what content triggered this notice.

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/s/ *John Doe*

Case No. 20-cv-07502

DECLARATIONS IN SUPPORT OF APPLICATION FOR TRO

DECLARATION OF MICHAEL DOE

I, **MICHAEL DOE**, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I am proceeding under a pseudonym in this case because I have maintained my anonymity with respect to the work that I do and the speech that I offer to the public. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. I have a Bachelor of Arts degree in Broadcast Journalism, 1992 from the University of Wisconsin – Eau Claire. The channels I created, The SGT Report YouTube channel(s), provide exclusive original interviews with Conservative and Christian authors & writers - as well as analysis and commentary regarding daily news, politics and events, both domestic and international.

3. I created a channel on YouTube on January 26, 2011 called “SGTreport2” I uploaded or caused to be uploaded approximately 31 videos on this channel. As of October 15, 2020, the channel had obtained approximately 107,000 subscribers, and the videos had been viewed by the public approximately 1,597,694 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel. I created a channel on YouTube on February 3, 2007 called “SGTreport” I uploaded or caused to be uploaded approximately 1,492 videos on this channel. As of October 15, 2020, the channel had obtained approximately 630,000 subscribers, and the videos had been viewed by the public approximately 130,503,359 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channels were deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channels were going to be deleted, suspended or terminated by YouTube. When I learned that the channels were deleted, it was

1 too late to export my content from the YouTube platform because it became inaccessible to me.
2 I was not given sufficient time, or any time, to export the content and information on the
3 channel that I had built up since the date of the channels' creation.

4 5. On October 15, 2020, and because of the actions YouTube took with respect to
5 my channel, I lost contact and the ability to connect with the subscribers, my regular audience,
6 through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise
7 contact the subscribers and audience I had built up over time. Because other media companies
8 are also in the process of taking action against my channel, I have lost a substantial, if not all,
9 of my YouTube audience.

10 6. Although other platforms indicate that they may remove channels or content at
11 any time, YouTube employs specific Terms of Service that assured me that in the absence of
12 strikes, my content and channel would remain intact. During the 90-day period preceding
13 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
14 any such strikes.

15 7. I was not notified by YouTube that they intended or had attempted to amend the
16 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
17 channels

18 8. I was not notified by YouTube of the specific reason for the suspension or
19 deletion of my channels other than an email referencing generally their cyberbullying and
20 harassment policy, but my content was not cyberbullying or harassing in the ways described in
21 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
22 was viewed by YouTube as being materially in breach of the TOS, only an email located after
23 the fact of deletion that said ""We'd like to inform you that due to repeated or severe violations
24 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
25 to what content triggered this notice.

26 9. I remain baffled as to what, specifically in my content, led my channels to be
27 part of the massive de-platforming. I assume that my channels were deleted or suspended
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1 because my channels have a widespread audience reach, I am not a member of the mainstream
2 media, and my content has at times focused on or questioned mainstream media or government.

3 I declare under the penalty of perjury under the laws of the United States of
4 America that the foregoing is true and accurate and that I executed this Declaration on October
5 27, 2020, through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a
6 declaration verified by electronic means.

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9 /s/ Michael Doe

10 MICHAEL DOE
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DECLARATION OF JAMES DOE

I, **JAMES DOE**, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I am proceeding under a pseudonym in this case because I have maintained my anonymity with respect to the work that I do and the speech that I offer to the public. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. X22Report is a daily news shows that discusses politics and financial reports. The channel's content is intended to cut through the corporate-controlled media and focus on real issues, and provides interview of persons in the political and financial world.

3. I created a channel on YouTube on February 4, 2013 called "X22Report." I uploaded or caused to be uploaded approximately 3,721 videos on this channel. As of October 15, 2020, the channel had obtained approximately 952,000 subscribers, and the videos had been viewed by the public approximately 292,569,198 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel. The other channels that were removed are X22 Report Spotlight, X22Report Newsflash – neither of these channels have any strikes and have similar content and were de-platformed along with my main site. These are situated in the same position as X33Report and I would like those channels restored as well.

4. My channels were deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel were going to be deleted, suspended or terminated by YouTube. When I learned that the channels were deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not given sufficient time, or any time, to export the content and information on the channel that I had built up since the date of the channels' creation.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channels, I lost contact and the ability to connect with the subscribers, my regular audience,

1 through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise
2 contact the subscribers and audience I had built up over time. Because other media companies
3 are also in the process of taking action against my channel, I have lost a substantial, if not all,
4 of my YouTube audience.

5 6. Although other platforms indicate that they may remove channels or content at
6 any time, YouTube employs specific Terms of Service that assured me that in the absence of
7 strikes, my content and channel would remain intact. During the 90-day period preceding
8 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
9 any such strikes.

10 7. I was not notified by YouTube that they intended or had attempted to amend the
11 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
12 channel.

13 8. I was not notified by YouTube of the specific reason for the suspension or
14 deletion of my channel other than an email referencing generally their cyberbullying and
15 harassment policy, but my content was not cyberbullying or harassing in the ways described in
16 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
17 was viewed by YouTube as being materially in breach of the TOS, only an email located after
18 the fact of deletion that said ““We'd like to inform you that due to repeated or severe violations
19 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
20 to what content triggered this notice.

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DECLARATION OF HENRY DOE

I, HENRY DOE, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I am proceeding under a pseudonym in this case because I have maintained my anonymity with respect to the work that I do and the speech that I offer to the public. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. The content I produce is to gather already open-source news that is not typically picked up by the mainstream media, and if I suggest any theories of how the information is meaningful, I encourage my audience to challenge me and conduct their own primary source research. The topics are generally in the areas of politics and current events, and I do discuss corruption.

3. I created a channel on YouTube on December 15, 2008 called "SpaceShot76." I uploaded or caused to be uploaded approximately 792 videos on this channel. As of October 15, 2020, the channel had obtained approximately 159,000 subscribers, and the videos had been viewed by the public approximately 32,227,188 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not given sufficient time, or any time, to export the content and information on the channel that I had built up since the date of the channel's creation.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channel, I lost contact and the ability to connect with the subscribers, my regular audience, through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise

1 contact the subscribers and audience I had built up over time. Because other media companies
2 are also in the process of taking action against my channel, I have lost a substantial, if not all,
3 of my YouTube audience.

4 6. Although other platforms indicate that they may remove channels or content at
5 any time, YouTube employs specific Terms of Service that assured me that in the absence of
6 strikes, my content and channel would remain intact. During the 90-day period preceding
7 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
8 any such strikes.

9 7. I was not notified by YouTube that they intended or had attempted to amend the
10 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
11 channel.

12 8. I was not notified by YouTube of the specific reason for the suspension or
13 deletion of my channel other than an email referencing generally their cyberbullying and
14 harassment policy, but my content was not cyberbullying or harassing in the ways described in
15 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
16 was viewed by YouTube as being materially in breach of the TOS, only an email located after
17 the fact of deletion that said ““We'd like to inform you that due to repeated or severe violations
18 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
19 to what content triggered this notice.

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1 9. I remain baffled as to what, specifically in my content, led my channel to be part
2 of the massive de-platforming. I assume that my channel was deleted or suspended because my
3 channel has a widespread audience reach, I am not a member of the mainstream media, and my
4 content focuses on or questions mainstream media or government.

5 I declare under the penalty of perjury under the laws of the United States of
6 America that the foregoing is true and accurate and that I executed this Declaration on October
7 27, 2020, through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a
8 declaration verified by electronic means.

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10 /s/ Henry Doe

11 HENRY DOE
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DECLARATION OF ROBERT DOE

I, **ROBERT DOE**, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I am proceeding under a pseudonym in this case because I have maintained my anonymity with respect to the work that I do and the speech that I offer to the public. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. I created content and bring forth news for open minded people. I, in no way shape or form condone violence or hate. My objective is to share information, I find interesting and stimulating for like-minded Patriots.

3. I created a channel on YouTube on March 5, 2015 called “TRUreporting” to share the content described above in Paragraph 2. I uploaded or caused to be uploaded approximately 864 videos on this channel. As of October 15, 2020, the channel had obtained approximately 216,000 subscribers, and the videos had been viewed by the public approximately 23,626,051 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not given sufficient time, or any time, to export the content and information on the channel that I had built up since the date of the channel’s creation.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channel, I lost contact and the ability to connect with the subscribers, my regular audience, through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise contact the subscribers and audience I had built up over time. Because other media companies

1 are also in the process of taking action against my channel, I have lost a substantial, if not all,
2 of my YouTube audience.

3 6. Although other platforms indicate that they may remove channels or content at
4 any time, YouTube employs specific Terms of Service that assured me that in the absence of
5 strikes, my content and channel would remain intact. During the 90-day period preceding
6 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
7 any such strikes.

8 7. I was not notified by YouTube that they intended or had attempted to amend the
9 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
10 channel.

11 8. I was not notified by YouTube of the specific reason for the suspension or
12 deletion of my channel other than an email referencing generally their cyberbullying and
13 harassment policy, but my content was not cyberbullying or harassing in the ways described in
14 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
15 was viewed by YouTube as being materially in breach of the TOS, only an email located after
16 the fact of deletion that said ““We'd like to inform you that due to repeated or severe violations
17 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
18 to what content triggered this notice.

19 9. I remain baffled as to what, specifically in my content, led my channel to be part
20 of the massive de-platforming. I assume that my channel was deleted or suspended because my
21 channel has a widespread audience reach, I am not a member of the mainstream media, and my
22 content focuses on or questions mainstream media or government.

23 I declare under the penalty of perjury under the laws of the United States of
24 America that the foregoing is true and accurate and that I executed this Declaration on October
25 27, 2020, through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a
26 declaration verified by electronic means.

27 /s/ Robert Doe

28 ROBERT DOE

DECLARATION OF CHRISTOPHER DOE

I, CHRISTOPHER DOE, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I am proceeding under a pseudonym in this case because I have maintained my anonymity with respect to the work that I do and the speech that I offer to the public. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. The content I created and uploaded on YouTube was clean, non-profane and very carefully constructed to ensure I didn't step over the line of any Community Guidelines. I reported the news and offered commentary about the state of the country from the point of view that if we came together as a country, we could solve our common problems. I never accused people of things they hadn't done, if claims were made regarding crimes, I made sure to note that they were alleged only, until proven guilty. I called for a return to an equal application of justice under the law. I never called for violence, I encouraged people to learn and understand their rights under the constitution and when I spoke about Q I never used the phrase Q anon, I merely discussed the posts in conjunction with world events. I never said Hillary ate babies or anything like that. I interviewed all kinds of interesting people on the weekends including Dinesh D'Souza, Roseanne Barr, Mark Shaw, Donald Jeffries, authors and historians, people who could comment on current events etc. The content was pretty mainstream and I was the lastt person I thought would get deleted.

3. I created a channel on YouTube on July 21, 2006 called "RedPill78." I uploaded or caused to be uploaded approximately 800 videos on this channel. As of October 15, 2020, the channel had obtained approximately 270,000 subscribers, and the videos had been viewed by the public approximately 48,764,950 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

1 4. My channel was deleted from the YouTube platform on October 15, 2020. Prior
2 to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended
3 or terminated by YouTube. When I learned that the channel was deleted, it was too late to
4 export my content from the YouTube platform because it became inaccessible to me. I was not
5 given sufficient time, or any time, to export the content and information on the channel that I
6 had built up since the date of the channel's creation.

7 5. On October 15, 2020, and because of the actions YouTube took with respect to
8 my channel, I lost contact and the ability to connect with the subscribers, my regular audience,
9 through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise
10 contact the subscribers and audience I had built up over time. Because other media companies
11 are also in the process of taking action against my channel, I have lost a substantial, if not all,
12 of my YouTube audience.

13 6. Although other platforms indicate that they may remove channels or content at
14 any time, YouTube employs specific Terms of Service that assured me that in the absence of
15 strikes, my content and channel would remain intact. During the 90-day period preceding
16 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
17 any such strikes.

18 7. I was not notified by YouTube that they intended or had attempted to amend the
19 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
20 channel.

21 8. I was not notified by YouTube of the specific reason for the suspension or
22 deletion of my channel other than an email referencing generally their cyberbullying and
23 harassment policy, but my content was not cyberbullying or harassing in the ways described in
24 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
25 was viewed by YouTube as being materially in breach of the TOS, only an email located after
26 the fact of deletion that said ""We'd like to inform you that due to repeated or severe violations
27 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
28 to what content triggered this notice.

/s/ Christopher Doe

Case No. 20-cv-07502

DECLARATIONS IN SUPPORT OF APPLICATION FOR TRO

DECLARATION OF MATTHEW DOE

I, **MATTHEW DOE**, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I am proceeding under a pseudonym in this case because I have maintained my anonymity with respect to the work that I do and the speech that I offer to the public. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. Edge of Wonder is an entertainment channel, with the main activity in video production. Edge of Wonder creates short educational videos, as well as documentary series. We also have a weekly live show each Friday night, during which we debate the latest updates in news from the US or around the world.

3. We created a channel on YouTube on December 6, 2017 called “Edge of Wonder.” I uploaded or caused to be uploaded approximately 316 videos on this channel, related to the content described in Paragraph 2, above. As of October 15, 2020, the channel had obtained approximately 467,000 subscribers, and the videos had been viewed by the public approximately 38,089,707 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. The channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible. We do not have the back up of the live shows that were streamed on the YouTube channel.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channel, I lost contact and the ability to connect with the subscribers, my regular audience, through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise contact the subscribers and audience I had built up over time. Because other media companies

1 are also in the process of taking action against my channel, I have lost a substantial, if not all,
2 of my YouTube audience.

3 6. Although other platforms indicate that they may remove channels or content at
4 any time, YouTube employs specific Terms of Service that assured me that in the absence of
5 strikes, my content and channel would remain intact. During the 90-day period preceding
6 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
7 any such strikes.

8 7. I was not notified by YouTube that they intended or had attempted to amend the
9 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
10 channel.

11 8. I was not notified by YouTube of the specific reason for the suspension or
12 deletion of my channel other than an email referencing generally their cyberbullying and
13 harassment policy, but my content was not cyberbullying or harassing in the ways described in
14 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
15 was viewed by YouTube as being materially in breach of the TOS, only an email located after
16 the fact of deletion that said ““We'd like to inform you that due to repeated or severe violations
17 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
18 to what content triggered this notice.

19 9. I remain baffled as to what, specifically in my content, led my channel to be part
20 of the massive de-platforming. I assume that my channel was deleted or suspended because my
21 channel has a widespread audience reach, I am not a member of the mainstream media, and my
22 content focuses on or questions mainstream media or government.

23 I declare under the penalty of perjury under the laws of the United States of America
24 that the foregoing is true and accurate and that I executed this Declaration on October 27, 2020,
25 through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a declaration
26 verified by electronic means.

27 /s/ Matthew Doe

28 MATTHEW DOE

Case No. 20-cv-07502

DECLARATIONS IN SUPPORT OF APPLICATION FOR TRO

DECLARATION ON POLLY ST. GEORGE

I, **POLLY ST. GEORGE**, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I am proceeding under a pseudonym in this case because I have maintained my anonymity with respect to the work that I do and the speech that I offer to the public. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. I research, report on and provide commentary in relation to current events, psychology and history. I try to draw connections between the past & the present by tracing ties between historical figures, organizations, companies and governments.

3. I created a channel on YouTube on March 9, 2016 called “Amazing Polly” to share the content described above in Paragraph 2. I uploaded or caused to be uploaded approximately 387 videos on this channel. As of October 15, 2020, the channel had obtained approximately 375,000 subscribers, and the videos had been viewed by the public approximately 24,660,282 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not given sufficient time, or any time, to export the content and information on the channel that I had built up since the date of the channel’s creation.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channel, I lost contact and the ability to connect with the subscribers, my regular audience, through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise contact the subscribers and audience I had built up over time. Because other media companies

1 are also in the process of taking action against my channel, I have lost a substantial, if not all,
2 of my YouTube audience.

3 6. Although other platforms indicate that they may remove channels or content at
4 any time, YouTube employs specific Terms of Service that assured me that in the absence of
5 strikes, my content and channel would remain intact. During the 90-day period preceding
6 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
7 any such strikes.

8 7. I was not notified by YouTube that they intended or had attempted to amend the
9 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
10 channel.

11 8. I was not notified by YouTube of the specific reason for the suspension or
12 deletion of my channel other than an email referencing generally their cyberbullying and
13 harassment policy, but my content was not cyberbullying or harassing in the ways described in
14 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
15 was viewed by YouTube as being materially in breach of the TOS, only an email located after
16 the fact of deletion that said ““We'd like to inform you that due to repeated or severe violations
17 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
18 to what content triggered this notice.

19 9. I remain baffled as to what, specifically in my content, led my channel to be part
20 of the massive de-platforming. I assume that my channel was deleted or suspended because my
21 channel has a widespread audience reach, I am not a member of the mainstream media, and my
22 content focuses on or questions mainstream media or government.

23 I declare under the penalty of perjury under the laws of the United States of America
24 that the foregoing is true and accurate and that I executed this Declaration on October 27, 2020,
25 through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a declaration
26 verified by electronic means.

27 /s/ Polly St. George

28 POLLY ST. GEORGE

DECLARATION OF SCOTT DEGROAT

I, **SCOTT DEGROAT**, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. The content I created for YouTube simply covers the news, the happenings of the day and expose corrupt people in our country and in the world. This show gives alternative viewpoints that go against the corrupt Legacy media's narratives. I offer a message of peace, constructive debate/long form discussion and nothing but love for this country on this channel. People that love this channel, love our country.

3. I created a channel on YouTube on April 27, 2019 called "Woke Societies." I uploaded or caused to be uploaded approximately 217 videos on this channel. As of October 15, 2020, the channel had obtained approximately 108,000 subscribers, and the videos had been viewed by the public approximately 4,617,715 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not given sufficient time, or any time, to export the content and information on the channel that I had built up since the date of the channel's creation.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channel, I lost contact and the ability to connect with the subscribers, my regular audience, through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise contact the subscribers and audience I had built up over time. Because other media companies

1 are also in the process of taking action against my channel, I have lost a substantial, if not all,
2 of my YouTube audience.

3 6. Although other platforms indicate that they may remove channels or content at
4 any time, YouTube employs specific Terms of Service that assured me that in the absence of
5 strikes, my content and channel would remain intact. During the 90-day period preceding
6 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
7 any such strikes.

8 7. I was not notified by YouTube that they intended or had attempted to amend the
9 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
10 channel.

11 8. I was not notified by YouTube of the specific reason for the suspension or
12 deletion of my channel other than an email referencing generally their cyberbullying and
13 harassment policy, but my content was not cyberbullying or harassing in the ways described in
14 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
15 was viewed by YouTube as being materially in breach of the TOS, only an email located after
16 the fact of deletion that said ““We'd like to inform you that due to repeated or severe violations
17 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
18 to what content triggered this notice.

19 9. I remain baffled as to what, specifically in my content, led my channel to be part
20 of the massive de-platforming. I assume that my channel was deleted or suspended because my
21 channel has a widespread audience reach, I am not a member of the mainstream media, and my
22 content focuses on or questions mainstream media or government.

23 I declare under the penalty of perjury under the laws of the United States of
24 America that the foregoing is true and accurate and that I executed this Declaration on October
25 27, 2020, through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a
26 declaration verified by electronic means.

27 /s/ Scott DeGroat

28 SCOTT DEGROAT

DECLARATION OF DAVID HAYES

I, **DAVID J. HAYES**, declare:

1. I am over the age of 18 years and a Plaintiff in this action I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. I have authored and published more 15 books, primarily in the areas of Christianity and the power of prayer. On the YouTube channel, “Praying Medic,” the focus is in two primary areas. The first is in the general area of Christianity, providing teachings and guides for hearing God’s voice and healing through prayer. I also post some limited content on issues related to the anonymous by “Q” posts and how those posts might be interpreted. Because I was seeing censorship in various places and Q was gaining more attention, I put all the Q-related videos on “private” several weeks before October 15, 2020. YouTube gave no indication that they would object to this content, and I did it in an abundance of caution. At the time I was de-platformed, the videos about Christianity and some old broadcasts from 2017 only were visible to the public.

3. I created a channel on YouTube on July 27, 2010 called “Praying Medic.” I uploaded or caused to be uploaded approximately 475 videos on this channel. As of October 15, 2020, the channel had obtained approximately 391,000 subscribers, and the videos had been viewed by the public approximately 40 million times. For example, for months for just January through March of 2020, my channel had more than 2.3M views and 16.3M impressions, meaning it was liked, shared, or commented upon. The Social Blade analytics are much lower than the screenshots that I retained for my analytics, which put the view count at over 40 million.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not

1 given sufficient time, or any time, to export the content and information on the channel that I
2 had built up since the date of the channel's creation.

3 5. On October 15, 2020, and because of the actions YouTube took with respect to
4 my channel, I lost contact and the ability to connect with the subscribers, my regular audience,
5 through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise
6 contact the subscribers and audience I had built up over time. Because other media companies
7 are also in the process of taking action against my channel, I have lost a substantial, if not all,
8 of my YouTube audience.

9 6. Although other platforms indicate that they may remove channels or content at
10 any time, YouTube employs specific Terms of Service that assured me that in the absence of
11 strikes, my content and channel would remain intact. During the 90-day period preceding
12 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
13 any such strikes.

14 7. I was not notified by YouTube that they intended or had attempted to amend the
15 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
16 channel.

17 8. I was not notified by YouTube of the specific reason for the suspension or
18 deletion of my channel other than an email referencing generally their cyberbullying and
19 harassment policy, but my content was not cyberbullying or harassing in the ways described in
20 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
21 was viewed by YouTube as being materially in breach of the TOS, only an email located after
22 the fact of deletion that said ""We'd like to inform you that due to repeated or severe violations
23 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
24 to what content triggered this notice.

25 ///

26 ///

27 ///

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and accurate and that I executed this Declaration on October 27, 2020, through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a declaration verified by electronic means.

DAVID J. HAYES

DECLARATION OF DANIEL LEE

I, **DANIEL LEE**, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. I report on child sex trafficking and exposing pedophiles in 2 daily, 15-20 minute news commentaries, that often tie in current events, politics and President Trump's unprecedented political power moves against human traffickers. I always provide several links below each video that provide citation and proof of the news I report so my viewers can share these sources with whoever may challenge the validity of my content.

3. I created two channels, one on October 7, 2007 and one on October 23, 2019. They were called "Dnajlion7" and "Daniel Lee." I uploaded 2,652 videos to the first, and 84 videos to the second. By October 15, 2020, Dnajlion7 had obtained approximately 113,000 subscribers, and Daniel Lee had obtained 30,300 subscribers; Dnajlion7 had obtained 28,361,823 views and Daniel Lee had obtained 999,348 views. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not given sufficient time, or any time, to export the content and information on the channel that I had built up since the date of the channel's creation.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channel, I lost contact and the ability to connect with the subscribers, my regular audience, through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise contact the subscribers and audience I had built up over time. Because other media companies

1 are also in the process of taking action against my channel, I have lost a substantial, if not all,
2 of my YouTube audience.

3 6. Although other platforms indicate that they may remove channels or content at
4 any time, YouTube employs specific Terms of Service that assured me that in the absence of
5 strikes, my content and channel would remain intact. During the 90-day period preceding
6 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
7 any such strikes.

8 7. I was not notified by YouTube that they intended or had attempted to amend the
9 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
10 channel.

11 8. I was not notified by YouTube of the specific reason for the suspension or
12 deletion of my channel other than an email referencing generally their cyberbullying and
13 harassment policy, but my content was not cyberbullying or harassing in the ways described in
14 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
15 was viewed by YouTube as being materially in breach of the TOS, only an email located after
16 the fact of deletion that said ““We'd like to inform you that due to repeated or severe violations
17 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
18 to what content triggered this notice.

19 9. I remain baffled as to what, specifically in my content, led my channel to be part
20 of the massive de-platforming. I assume that my channel was deleted or suspended because my
21 channel has a widespread audience reach, I am not a member of the mainstream media, and my
22 content focuses on or questions mainstream media or government.

23 I declare under the penalty of perjury under the laws of the United States of
24 America that the foregoing is true and accurate and that I executed this Declaration on October
25 27, 2020, through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a
26 declaration verified by electronic means.

27 */s/ Daniel Lee*

28 DANIEL LEE

DECLARATION OF MISHEL McCUMBER

I, MISHEL McCUMBER, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. I am an author, artist and a researcher. I have a Bachelor of Arts in Psychology and another in Graphic Design. I share my personal journey, with the goal to install a desire for sound biblical doctrine. Deception Bytes is an often humorous one-hour news and political commentary show from a conservative Christian and patriotic perspective.

3. I created a channel on YouTube on July 31, 2011 called "Deception Bytes." I uploaded or caused to be uploaded approximately 1,030 videos on this channel. As of October 15, 2020, the channel had obtained approximately 69,200 subscribers, and the videos had been viewed by the public approximately 18,239,613 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not given sufficient time, or any time, to export the content and information on the channel that I had built up since the date of the channel's creation.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channel, I lost contact and the ability to connect with the subscribers, my regular audience, through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise contact the subscribers and audience I had built up over time. Because other media companies are also in the process of taking action against my channel, I have lost a substantial, if not all, of my YouTube audience.

1 6. Although other platforms indicate that they may remove channels or content at
2 any time, YouTube employs specific Terms of Service that assured me that in the absence of
3 strikes, my content and channel would remain intact. During the 90-day period preceding
4 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
5 any such strikes.

6 7. I was not notified by YouTube that they intended or had attempted to amend the
7 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
8 channel.

9 8. I was not notified by YouTube of the specific reason for the suspension or
10 deletion of my channel other than an email referencing generally their cyberbullying and
11 harassment policy, but my content was not cyberbullying or harassing in the ways described in
12 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
13 was viewed by YouTube as being materially in breach of the TOS, only an email located after
14 the fact of deletion that said ““We'd like to inform you that due to repeated or severe violations
15 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
16 to what content triggered this notice.

17 9. I remain baffled as to what, specifically in my content, led my channel to be part
18 of the massive de-platforming. I assume that my channel was deleted or suspended because my
19 channel has a widespread audience reach, I am not a member of the mainstream media, and my
20 content focuses on or questions mainstream media or government.

21 I declare under the penalty of perjury under the laws of the United States of
22 America that the foregoing is true and accurate and that I executed this Declaration on October
23 27, 2020, through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a
24 declaration verified by electronic means.

25
26 /s/ Mishel McCumber

27 MISHEL McCUMBER

DECLARATION OF JEFF PEDERSEN

I, **JEFF PEDERSON**, declare:

1. I am over the age of 18 years and a Plaintiff in this action I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. InTheMatrixxx is a live talk show, featuring interviews and talk about issues prominent in news and politics. We discuss and dissect the mainstream news and also discuss the words contained in the anonymous Q posts, and present theories about what they might mean. We encourage our audience to think for themselves, with the tag line: “the TRUTH is learned, never told.”

3. I created a channel on YouTube on July 11, 2013 called “InTheMatrixx.” I uploaded or caused to be uploaded approximately 464 videos on this channel. As of October 15, 2020, the channel had obtained approximately 76,900 subscribers, and the videos had been viewed by the public approximately 4,667,4075 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not given sufficient time, or any time, to export the content and information on the channel that I had built up since the date of the channel’s creation.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channel, I lost contact and the ability to connect with the subscribers, my regular audience, through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise contact the subscribers and audience I had built up over time. Because other media companies

1 are also in the process of taking action against my channel, I have lost a substantial, if not all,
2 of my YouTube audience.

3 6. Although other platforms indicate that they may remove channels or content at
4 any time, YouTube employs specific Terms of Service that assured me that in the absence of
5 strikes, my content and channel would remain intact. During the 90-day period preceding
6 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
7 any such strikes.

8 7. I was not notified by YouTube that they intended or had attempted to amend the
9 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
10 channel.

11 8. I was not notified by YouTube of the specific reason for the suspension or
12 deletion of my channel other than an email referencing generally their cyberbullying and
13 harassment policy, but my content was not cyberbullying or harassing in the ways described in
14 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
15 was viewed by YouTube as being materially in breach of the TOS, only an email located after
16 the fact of deletion that said ""We'd like to inform you that due to repeated or severe violations
17 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
18 to what content triggered this notice.

19 9. I remain baffled as to what, specifically in my content, led my channel to be part
20 of the massive de-platforming. I assume that my channel was deleted or suspended because my
21 channel has a widespread audience reach, I am not a member of the mainstream media, and my
22 content focuses on or questions mainstream media or government.

23 I declare under the penalty of perjury under the laws of the United States of
24 America that the foregoing is true and accurate and that I executed this Declaration on October
25 27, 2020, through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a
26 declaration verified by electronic means.

27 /s/ Jeff Pederson

28 JEFF PEDERSON

DECLARATION ON JORDAN SATHER

I, **JORDAN SATHER**, declare:

1. I am over the age of 18 years and a Plaintiff in this action. I make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. I started my YouTube channel Destroying the Illusion in January 2017 to discuss with audiences a variety of subjects I had been interested in and researching for years, including topics related to health, philosophy, politics, and alternative phenomenon like UFOs and other newly emerging sciences. My goal with the channel was to offer credible evidence and empowering information on matters that I feel are of personal, national, and global importance. It had rapid growth in 2017, earning 100,000 subscribers within the first year. The channel was also a pivotal cornerstone to the media business I was creating, which also involved speaking at conferences around the country, creating a #1 iTunes documentary, and other content creation.

3. I created a channel on YouTube on January 15, 2015 called “Destroying the Illusion” to share the content set forth above in Paragraph 2. I uploaded or caused to be uploaded approximately 464 videos on this channel. As of October 15, 2020, the channel had obtained approximately 238,000 subscribers, and the videos had been viewed by the public approximately 35,050,517 times. I also created a second channel on YouTube on February 23, 2018, to share the same content and uploaded 3 videos to this channel. As of October 15, 2020, this back up channel had obtained approximately 51,600 subscribers, and the videos had been viewed by the public approximately 7,606 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to

1 export my content from the YouTube platform because it became inaccessible to me. I was not
2 given sufficient time, or any time, to export the content and information on the channel that I
3 had built up since the date of the channel's creation.

4 5. On October 15, 2020, and because of the actions YouTube took with respect to
5 my channel, I lost contact and the ability to connect with the subscribers, my regular audience,
6 through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise
7 contact the subscribers and audience I had built up over time. Because other media companies
8 are also in the process of taking action against my channel, I have lost a substantial, if not all,
9 of my YouTube audience.

10 6. Although other platforms indicate that they may remove channels or content at
11 any time, YouTube employs specific Terms of Service that assured me that in the absence of
12 strikes, my content and channel would remain intact. During the 90-day period preceding
13 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
14 any such strikes.

15 7. I was not notified by YouTube that they intended or had attempted to amend the
16 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
17 channel.

18 8. I was not notified by YouTube of the specific reason for the suspension or
19 deletion of my channel other than an email referencing generally their cyberbullying and
20 harassment policy, but my content was not cyberbullying or harassing in the ways described in
21 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
22 was viewed by YouTube as being materially in breach of the TOS, only an email located after
23 the fact of deletion that said ""We'd like to inform you that due to repeated or severe violations
24 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
25 to what content triggered this notice.

26 9. I remain baffled as to what, specifically in my content, led my channel to be part
27 of the massive de-platforming. I assume that my channel was deleted or suspended because my
28

1 channel has a widespread audience reach, I am not a member of the mainstream media, and my
2 content focuses on or questions mainstream media or government.

3 I declare under the penalty of perjury under the laws of the United States of
4 America that the foregoing is true and accurate and that I executed this Declaration on October
5 27, 2020, through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a
6 declaration verified by electronic means.

7 /s/ Jordan Sather

8 JORDAN SATHER

DECLARATION OF SARAH WESTALL

I, SARAH WESTALL, declare:

1. I am over the age of 18 years and a Plaintiff in this actionI make this Declaration based on my own personal knowledge. If called as a witness, I could and would testify competently as follows.

2. The content at issue is marketed and contains content as follows: Sarah Westall's Business Game Changers provides insight and depth unparalleled in the media. Listen to top experts and truth backed by data and witnesses, not propaganda. Journey into what the mainstream media has long abandoned; courageous reporting on topics that matter.

3. I created a channel on YouTube on April 4, 2012 called "Sarah Westall." I uploaded or caused to be uploaded approximately 669 videos on this channel. As of October 15, 2020, the channel had obtained approximately 125,000 subscribers, and the videos had been viewed by the public approximately 15,367,959 times. These numbers are approximate and taken from aggregators Social Blade, Alt Censored or from historical screenshots I took of my channel, because once my channel was deleted, I lost the ability to see the analytics related to my channel.

4. My channel was deleted from the YouTube platform on October 15, 2020. Prior to October 15, 2020, I did not have notice that my channel was going to be deleted, suspended or terminated by YouTube. When I learned that the channel was deleted, it was too late to export my content from the YouTube platform because it became inaccessible to me. I was not given sufficient time, or any time, to export the content and information on the channel that I had built up since the date of the channel's creation.

5. On October 15, 2020, and because of the actions YouTube took with respect to my channel, I lost contact and the ability to connect with the subscribers, my regular audience, through the YouTube platform. I cannot now effectively reach and cannot effectively otherwise contact the subscribers and audience I had built up over time. Because other media companies are also in the process of taking action against my channel, I have lost a substantial, if not all, of my YouTube audience.

1 6. Although other platforms indicate that they may remove channels or content at
2 any time, YouTube employs specific Terms of Service that assured me that in the absence of
3 strikes, my content and channel would remain intact. During the 90-day period preceding
4 October 15, 2020, I did not have any active strikes on my channel and had not been notified of
5 any such strikes.

6 7. I was not notified by YouTube that they intended or had attempted to amend the
7 TOS on or before October 15, 2020 in a way that would affect the hosting of my content or
8 channel.

9 8. I was not notified by YouTube of the specific reason for the suspension or
10 deletion of my channel other than an email referencing generally their cyberbullying and
11 harassment policy, but my content was not cyberbullying or harassing in the ways described in
12 the policy that existed on or before October 15, 2020. I was not notified what, if any content,
13 was viewed by YouTube as being materially in breach of the TOS, only an email located after
14 the fact of deletion that said ““We'd like to inform you that due to repeated or severe violations
15 of our Community Guidelines (<https://www.youtube.com/> There was no further specificity as
16 to what content triggered this notice.

17 9. I remain baffled as to what, specifically in my content, led my channel to be part
18 of the massive de-platforming. I assume that my channel was deleted or suspended because my
19 channel has a widespread audience reach, I am not a member of the mainstream media, and my
20 content focuses on or questions mainstream media or government.

21 I declare under the penalty of perjury under the laws of the United States of
22 America that the foregoing is true and accurate and that I executed this Declaration on October
23 27, 2020, through electronic signature pursuant to L.R. 5-1(a) permitting the signature of a
24 declaration verified by electronic means.

25 /s/ Sarah Westall

26 SARAH WESTALL